



February 25, 2013

Mr. Jeffrey Tobias
Mobility Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT DOCKET NO. 01-289; PROPOSED RULES, AVIATION COMMUNICATIONS, REQUEST FOR COMMENT PERIOD EXTENSION

Dear Mr. Tobias:

The Aircraft Owners and Pilots Association (AOPA), Experimental Aircraft Association (EAA), General Aviation Manufacturers Association (GAMA) and National Air Transportation Association (NATA) respectfully request a 60-day extension of the comment period for the Federal Communications Commission's (FCC) proposed rules for Aviation Communications, docket number 01-289, as published in the *Federal Register* on January 30, 2013, and relating to the use of emergency locator transmitters (ELT) broadcasting on 121.5 MHz.

As representatives of individual aircraft owners and pilots, manufacturers and aviation businesses utilizing 121.5 MHz ELTS, the aforementioned associations and their memberships have a significant interest in these proposed rules and believe that the current 30-day public comment period is insufficient to provide for adequate review, discussion and response.

A 60-day extension of the public comment period would allow the associations and our members time to complete a more detailed analysis of how the proposed rules will affect the industry and to respond to the many questions posed by the FCC in the *Third Further Notice of Proposed Rulemaking*. Specifically, we are attempting to collect additional information on the number of affected aircraft, the number of small businesses impacted and the economic impact of the FCCs proposal.

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AOPA, EAA, GAMA and NATA are also planning to attend a meeting with FCC staff that was scheduled by the Small Business Administration Office of Advocacy to discuss this proposal. As this meeting will occur just prior to the current conclusion of the comment period, our opportunity to address, in comments, topics arising from that discussion will be limited absent an extension to the comment period deadline.

Thank you for your consideration of this request. Please direct any follow-up questions or comments to NATA Director, Regulatory Affairs Michael France (mfrance@nata.aero, 703-845-9000).

Sincerely,



Robert Hackman
AOPA



Douglas Macnair
EAA



Gregory Bowles
GAMA



Michael France
NATA